

Dear California Air Resources Board Members,

Sportfishing and whale watching boats are not only valued sources of outdoor recreation, but they are important economic contributors to California's coastal communities and their tourist industries. Commercial passenger boats only represent less than 10% of all harbor crafts, yet these local small businesses draw in hundreds of thousands of visitors each year. These businesses have contributed \$5.6 billion a year in economic activity and have supported nearly 40,000 jobs in California. The tourism industry is just beginning to recover from the devastating impacts of the pandemic, and before these commercial passenger boat businesses have been able to recuperate the California Air Resources Board is proposing costly engine emission regulations.

These proposed regulations will require technology that has not yet been developed for use on commercial fishing vessels. The modifications needed to comply with this regulation are often too large to fit in existing engine rooms. Even in the cases where the modifications fit, the California State University of Maritime Academy concluded that the modifications would significantly impact vessel stability. Boat owners have many safety concerns beyond stability issues. There has been little testing done at sea for engines with DPF's. It is concerning that the U.S. Coast Guard has not been included in discussions regarding the safety of these regulations, considering they are responsible for regulating the safety of commercial passenger vessels.

The California Air Resources Board has concluded that wood and fiberglass boats will likely have to be removed from service. Over 80% of commercial passenger boats are constructed of wood and fiberglass and owners will be required to purchase new metal boats as soon as 2023. With small businesses continuing to recover from the pandemic, the costs associated with this regulation would likely put many commercial passenger boat companies out of business.

While we should embrace the need to reduce engine emissions, we encourage the California Air Resources Board to find a way to do so that does not place additional burden upon our local small business boating operations. There must be a solution that is both economically viable and environmentally sound. This regulation feels rushed and has not done enough to address the realistic and valid concerns of the passenger boat industry. We hope that the California Air Resources Board will choose not to adopt these new regulations, and instead take the time to find a solution that does not threaten the important passenger boats that help our coastal communities thrive.

Sincerely,

Santa Barbara South Coast Chamber of Commerce